



**DEREK SMITH**  
**LAW GROUP, PLLC**  
Employment Lawyers Representing Employees Exclusively

December 16, 2019

**VIA ECF**

Honorable Alison J. Nathan  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York

DEC 19 2019

**Re: Mohamed Farghaly v. Potamkin Cadillac-Buick-Chevrolet-Geo, Ltd., et al.**  
**Civil Action No. 18-cv-11106 (AJN)**


Dear Judge Nathan:

Our office represents Plaintiff Mohamed Farghaly in the above-referenced matter. Fact discovery is currently scheduled to close on December 16, 2019. Pursuant to Section 1(D) of Your Honor's Individual practices, we write jointly with Defendants' counsel to respectfully request a sixty (60) day stay of discovery, until February 14, 2020, pending a private mediation, as well as a 60 day extension of the close of expert discovery from January 29, 2020, to March 29, 2020.

The parties continue to work cooperatively in discovery and have now completed all anticipated depositions. There is minimal paper discovery left to be completed, and the parties are in the process of confirming mediation details and scheduling a private mediation to hopefully resolve the matter.

Accordingly, we respectfully request a sixty (60) day stay of discovery, until February 14, 2020, pending a private mediation, as well as a 60 day extension of the close of expert discovery from January 29, 2020, to March 29, 2020.

Respectfully submitted,  
**DEREK SMITH LAW GROUP, PLLC**

  
Ishan Dave

cc: all Parties via ECF

The request for a stay and extension of discovery is hereby GRANTED. Discovery is stayed until February 14, 2020, and the close of expert discovery is extended to March 29, 2020. The case management conference currently scheduled for January 17, 2020 is adjourned to March 13, 2020 at 4:00 p.m. No further extensions will be granted.  
**SO ORDERED.**

**SO ORDERED**

  
HON. ALISON J. NATHAN  
UNITED STATES DISTRICT JUDGE

12/18/19